

Defendant #2:

C. Defendant Robert Dewell is employed as

(Name of Second Defendant)

Jailer / Staff of Alton City Jail / Federal holdover
(Position/Title)

with Alton City Jail, Alton, IL 62002
(Employer's Name and Address)

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☒ Yes ☐ No

If you answer is YES, briefly explain: He was ~~over~~ under Sgt. Kremer and over most of other Jail staff in seniority.

Additional Defendant(s) (if any):

D. Using the outline set forth above, identify any additional Defendant(s).

- Robert Ross - Jailer / Staff of Alton City Jail Alton, IL 62002
- Evan Bailey - Jailer / Staff of Alton City Jail Alton, IL 62002
- Colleen Moore - Jailer / Staff of Alton City Jail Alton, IL 62002
- Unknown Party - which consist of other jailers / Staff members of Alton City Jail Alton, IL 62002
- and also if there is any other party "liable" for giving the order to any and all listed "defendants(s) to view the cameras in the cells of the Jail.

II. PREVIOUS LAWSUITS

A. Have you begun any other lawsuits in state or federal court relating to your imprisonment? ☒ Yes ☐ No

B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. Failure to comply with this provision may result in summary denial of your complaint.

1. Parties to previous lawsuits: Claim I. No law library. Claim II. Invasion of
Plaintiff(s): Timothy Collier, Leray Lucas, Jason Edwards, Privacy,
David Bradford, Miles Musgrave, Sammie Holiday, George Holiday, Kenyan Walton,
Sean Thompson, Ladrey Webb
Defendant(s): Sgt. Kramer et. al. Colleen Moore, Robert Dewalt, Robert Ross
and other unknown staff of the Alton City Jail/federal holdover.
2. Court (if federal court, name of the district; if state court, name of the county): 7th district of Southern Illinois.
3. Docket number:
Case No. 15-cv-674-SM4
4. Name of Judge to whom case was assigned: District Judge: Yandle
5. Type of case (for example: Was it a habeas corpus or civil rights action?): Civil Rights (class action)
6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?): The case was dismissed, due to the Judge's order stating it was not properly filed. (That it did not meet "class action" necessities. I was order to file separate due to different needs of each plaintiff.
7. Approximate date of filing lawsuit: 6-18-15
8. Approximate date of disposition: 12/22/15

III. GRIEVANCE PROCEDURE

A. Is there a prisoner grievance procedure in the institution? ☒ Yes ☐ No

B. Did you present the facts relating to your complaint in the prisoner grievance procedure? ☒ Yes ☐ No

C. If your answer is YES,

1. What steps did you take? Spoke with and expressed my grievance with Jail Staff, then I wrote an grievance to document the issuance at hand.

2. What was the result? Never heard anything more about the matter, and was informed by Jail staff that, "They are doing their job".

D. If your answer is NO, explain why not.

E. If there is no prisoner grievance procedure in the institution, did you complain to prison authorities? ☐ Yes ☐ No

F. If your answer is YES,

1. What steps did you take?

2. What was the result?

G. If your answer is NO, explain why not.

H. Attach copies of your request for an administrative remedy and any response you received. If you cannot do so, explain why not:

I was never returned the grievance at hand seeking remedy, or any of the other grievances I've written about anything else while in this jail.

IV. STATEMENT OF CLAIM

- A. State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments of citations. If you wish to present legal arguments or citations, file a separate memorandum of law. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. If your claims relate to prison disciplinary proceedings, attach copies of the disciplinary charges and any disciplinary hearing summary as exhibits. You should also attach any relevant, supporting documentation.

Claim: Invasion of Privacy:

1. There is an "360" (degree) camera located within my cell (living area). In which I am under constant surveillance at all times, even while I attend to any and all of my personal needs, and or body functions, such as:
 - (i) Getting dressed and undressed for hygiene purposes.
 - (ii) Using the restroom (urinating and bowel movements)

1. Violation of my 1st amendment rights.
 - Freedom to practice my religion;
 - (i) I am Sunni Muslim, and all (3) main forms of my religions doctrine, ¹ Qur'an, ² Hadith, and ³ Shariah law state that it is un-permissible to be viewed "naked" or "shameful" not only by another female other than my wife, but also by anyone "male or female" if they are of reasonable age and mental compositity to know the shame of "sexual activities" or "sexual intercourse".
 - (ii) All stated defendants both known and unknown have had to view me naked at some point of my being detained at their place of employment, due to the camera in my cell.

2. Violation of my 8th amendment rights.
 - Cruel and Un-usual punishment.
 - (i) Since the date of my arrival at this location (Alton City Jail/Federal holdover), I have been subject to the "shame" and "humiliation" and any of the other psychological feeling that go along with the feeling of "knowing" I am constantly being watched (voyered) while I am naked and at my "lowest" or most "vulnerable" moments, while attending to my bodies human "necessities" of "using the restroom", by any and all staff that work at this location.

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

- (i) To be compensated for the violation of my civil rights.
- (ii) That the camera's be taken out of the cell.

VI. JURY DEMAND (check one box below)

The plaintiff ☒ does ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 1-15-16
(date)

David L. Bradford
Signature of Plaintiff

1700 E. Broadway
Street Address

David L. Bradford
Printed Name

Alton, IL 62002
City, State, Zip

Prisoner Register Number

Signature of Attorney (if any)